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# **BIG RIVER ZINC CORPORATION**

**ROUTE 3 & MONSANTO AVENUE  
SAUGET, ILLINOIS 62201**

June 1, 1999

**TEL: 618-274-5000  
FAX: 618-274-4444**

Mr. Thomas Martin  
Associate Regional Counsel  
Region 5  
U. S. Environmental Protection Agency  
77 West Jackson Boulevard (C-14J)  
Chicago, Illinois 60604-3590

Re: Parcel No. 01-35.0-200-035

Dear Mr. Martin:

Several weeks ago, I was contacted by an attorney for Solutia, Inc. to obtain an "access agreement" covering the above captioned property in St. Clair County, Illinois. Apparently access is necessary to perform environmental testing as part of an agreement between Solutia, Inc. and U. S. Environmental Protection Agency.

The attorney indicated she had identified Big River Zinc Corporation as the "owner" based on a chart obtained from U. S. Environmental Protection Agency. The chart is captioned "Current Ownership as of September 24, 1997 - Site L - Sauget Area I Sites" (may reference number 1.2) and indicates that the above captioned parcel number's property address is "Korea Zinc Co., Monsanto Avenue, Cahokia, IL 62206" and that the owner as "Big River Zinc Corporation." I understand the chart was created by Ecology and Environment, Inc. (Sauget Area 1 & 2 Technical Assistance Project, ARCS Contract 68-W8-0086 and WA No. 47-5N60).

I am not certain how the chart's information was obtained, but I cannot find anything in Big River Zinc Corporation's [f/k/a Korea Zinc Company (USA), Inc.] records which indicate that it purchased or obtained this parcel on or after April 8, 1996 (the date the assets to the smelter in Sauget, Illinois, were purchased). Furthermore Big River Zinc Corporation's Accounting Department is not receiving or paying a real estate tax for this parcel.

I asked the Thompson Coburn of law firm to check the St. Clair County Recorder's office and was told that this parcel number was previously shown as "01-35-0-200-032" and was changed to the above captioned parcel number at some point after the parcel was purchased by L. Keeley Paving and Construction Company.

In summary, Big River Zinc Corporation is not the owner of the above captioned parcel. Your chart should be noted accordingly. If you have any questions about this, please call me.

Very truly yours,

A handwritten signature in dark ink, appearing to read "R. Ashby", written in a cursive style.

Richard J. Ashby  
General Counsel

U.S. ENVIRONMENTAL  
PROTECTION AGENCY

JUN 07 1999

OFFICE OF REGIONAL  
COUNSEL